

CHAITMAN LLP
465 PARK AVENUE
NEW YORK, NY 10022
(888) 759-1114
TELEPHONE & FAX

HELEN DAVIS CHAITMAN
hchaitman@chaitmanllp.com

July 13, 2016

BY ECF and U.S. REGULAR MAIL

The Honorable Stuart M. Bernstein
United States Bankruptcy Court
Southern District of New York
One Bowling Green
New York, NY 10004-1408

Re: *Picard v. Edward A. Zraick Jr., et al.*, Adv. Pro. No. 10-05257 (SMB);
Adversary Proceedings Listed on Exhibit A to Notice of Motion for an Order Authorizing
the Deposition of Bernard L. Madoff (Case No. 08-01789, Dkt. No. 13603-1)

Dear Judge Bernstein:

We write in response to the letter from the Trustee's counsel asking that our motion to depose Madoff be adjourned to August 31, 2016. We strongly oppose that request because it will not give us time to take the follow-up discovery we will need, based upon Mr. Madoff's testimony. Therefore, we urge the Court to retain the July 27, 2016, return date for our motion.

Yours respectfully,

/s/ Helen Davis Chaitman

Helen Davis Chaitman

HDC/sh

cc: (by ECF and E-mail)
David J. Sheehan (dsheehan@bakerlaw.com)
Ricard A. Kirby (Ricarhd.Kirby@bakermckenzie.com)
Robert A. Rich, Esq. (rrich2@hunton.com)